

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII**

NATIONAL ASSOCIATION FOR GUN RIGHTS)	Civil No. 22-cv-00404-DKW-RT
)	
and)	
)	
RONDELLE AYAU)	DECLARATION OF DUDLEY BROWN
)	
and)	
)	
JEFFREY BRYANT)	
)	
Plaintiffs,)	
vs.)	
)	
HOLLY SHIKADA, in her official capacity as)	
Attorney General for the State of Hawai'i)	
)	
Defendant.)	

1. My name is Dudley Brown. I am over the age of 18 and have personal knowledge of the matters set forth in this Declaration.
2. I am the President of National Association for Gun Rights (“NAGR”).
3. The term “assault pistol” as defined in HAW. REV. STAT. § 134-1 is not a technical term used in the firearms industry or community. Instead, the term is a rhetorically charged political term meant to stir the emotions of the public against those persons who choose to exercise their constitutional right to possess certain semi-automatic firearms that are commonly owned by law-abiding American citizens for lawful purposes.
4. For purposes of this Declaration, the term “Banned Firearm” shall have the same meaning as the term “assault pistol” in HAW. REV. STAT. § 134-1. For purpose of this Declaration, the term “Banned Magazine” shall mean a magazine the manufacture, possession,

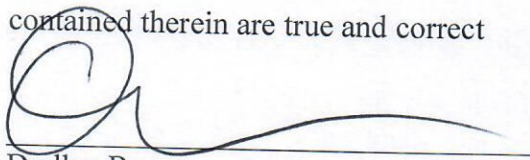
sale, barter, trade, gift, transfer, or acquisition of which is prohibited by HAW. REV. STAT. § 134-8(c).

5. NAGR seeks to defend the right of all law-abiding individuals to keep and bear arms. NAGR has members who reside within the State of Hawai'i. NAGR represents the interests of its members who reside in the State. NAGR's members on whose behalf this action is brought are law abiding citizens and but for the prohibitions of the Statutes, they would be entitled lawfully to manufacture, possess, sell, barter, trade, gift, transfer, or acquire Banned Firearms and Banned Magazines.

6. The Statutes challenged in this action have chilled NAGR's members on whose behalf this action is brought in the exercise of their constitutional rights to keep and bear arms. They currently desire to acquire, possess, sell and transfer Banned Firearms and Banned Magazines and would do so but for the prohibitions of the Statutes.

7. Plaintiffs requested the State to disavow enforcement of the Statutes challenged in this action. The State responded to this request but did not disavow enforcement of the Statutes.

I, Dudley Brown, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that I have reviewed the foregoing, that I am competent to testify in this matter, and that the facts contained therein are true and correct

A handwritten signature in dark ink, appearing to be 'Dudley Brown', written over a horizontal line.

Dudley Brown
November 17, 2022